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**CARDIQCOP, LLC**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

ROBERT BOSCH HEALTHCARE SYSTEMS, INC., ) CASE NO. 3:14-CV-01575-EMC

CASE NO. 3:14-CV-01575-EMC

Plaintiff, ) **JOINT STIPULATION TO CONTINUE  
HEARING DATE ON PLAINTIFF'S  
MOTION TO DISQUALIFY  
MERCHANT & COULD**

CARDIOPCOM LLC

### Defendant Counterclaimant

**JOINT STIPULATION TO CONTINUE  
HEARING DATE ON PLAINTIFF'S  
MOTION TO DISQUALIFY  
MERCHANT & COULD**

Pursuant to Civil Local Rules 7-12, Plaintiff Robert Bosch Healthcare Systems, Inc. and Defendant Cardiocom, LLC ("Cardiocom") hereby submit this Joint Stipulation Requesting Continuance of Hearing on Plaintiff's Motion to Disqualify Merchant & Gould. *See* Dkt. No. 59. The hearing on that motion is presently scheduled for May 22, 2014. *See* Dkt. No. 89. The parties request that the hearing be continued to May 29, 2014.

This stipulation to continue the hearing date is requested to accommodate a scheduling conflict that Cardiocom's lead counsel has on May 22. Cardiocom's lead counsel, Daniel McDonald of the Merchant & Gould firm, has indicated that he will be in Minnesota on that date to take the deposition of Plaintiff's technical expert relating to his testimony submitted by Plaintiff to the U.S. Patent Office Patent Trial and Appeal Board in ongoing *inter partes* review ("IPR") proceedings concerning patents asserted in this litigation. The parties agreed to the date and location of this deposition prior to the Court's setting of the hearing date to May 22, and Plaintiff's counsel has indicated that the witness is unable to reschedule.

The requested continuance shall not otherwise affect scheduling issues for the case.

**IT IS SO STIPULATED**, through counsel of record:

DATED: May 9, 2014

*/s/ Bas de Blank*

Counsel for Plaintiff Robert Bosch Healthcare Systems, Inc.

DATED: May 9, 2014

*/s/ Timothy G. Majors*

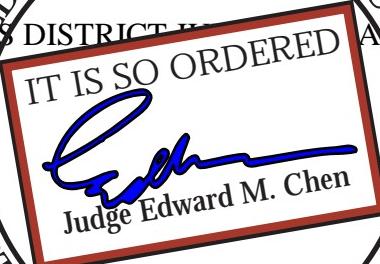
Counsel for Defendant Cardiocom, LLC

**PURSUANT TO STIPULATION, IT IS SO ORDERED** that the hearing on Plaintiff's Motion to Disqualify Merchant & Gould is continued to May 29, 2014:

Dated: May 12, 2014

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

JUDGE EDWARD M. CHEN



1                   **ATTESTATION OF CONCURRENCE IN FILING**

2                   I, Timothy G. Majors, am the ECF User whose identification and password are being used to  
3 file this Joint Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that Bas de Blank  
4 of Orrick, Herrington & Sutcliffe LLP has concurred in this filing.

5                   DATED: May 9, 2014

6                   */s/ Timothy G. Majors*  
7                   Timothy G. Majors

8                   **CERTIFICATE OF SERVICE**

9                   I hereby certify that on May 9, 2014, a true and correct copy of the foregoing document is  
10 being filed electronically with the Clerk of the United States District Court for the Northern District  
11 of California by using the CM/ECF system, which will send notice of such filing to all counsel of  
12 record.

13                   Date: May 9, 2014

14                   */s/ Timothy G. Majors*  
15                   Timothy G. Majors